

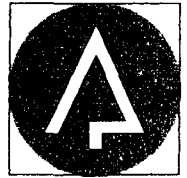
Libby Biomass Working Group

Energy, Jobs and Environmental Protection thru forest waste utilization

SDMS Document ID



2009703



Jim Christianson
Project Manager
Libby Superfund Site
Libby, Montana

June 11, 2003

Dear Mr. Christianson:

As you know, the Libby Biomass Working Group has prepared a proposal for a Libby Forest Biomass Comprehensive Plan to harvest slash and convert it to low-cost heat and electricity through clean combustion in a modern co-generation system.

We would like to use this letter to point out to you features of our Comprehensive Plan that are relevant to the asbestos-abatement mission of the EPA in Libby as well as the overall environmental quality of the Libby air and watersheds.

The Lincoln County Health Dept. and the Montana Dept. of Environmental Quality (MDEQ) have provided us with information on Libby's air quality and the emission tests done on the Zurn boiler at the former Stimson Site. Comparison of the Zurn test results with the results from the KMW system that we are recommending show over 90% reduction in carbon monoxide emissions and dramatic reduction in oxides of nitrogen. These units are designed to high air quality standards for populated areas.

Warren Norton of MDEQ remarked that Libby has a "compelling" reason to upgrade to co-generation to improve the town's air quality.

Elton Erp, Vicki Walsh, Dave Kemp, and Karen Wilson of MDEQ have also provided information to the Working Group.

In addition to the Zurn test results and the KMW cogen data, the enclosed packet contains a copy of Environmental Benefits of Biomass Cogeneration which was prepared by the Working Group for the EPA's Dream It, Do It Conference held here in Libby.

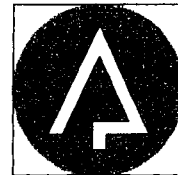
Improvements in air quality through clean combustion and the elimination of open slash burning in the woods will help alleviate the suffering of our large local population who are afflicted with asbestos-related diseases. Moreover, by harvesting hazardous fuels from Libby's urban interface our Plan seeks to lessen the potential of re-entrainment of deposited asbestos fibers into the atmosphere by wildfire.

Implementation of a heating district from the cogen unit will reduce the use of sulfur-bearing fossil fuel in this area that is subject to frequent air inversion.

The KMW cogen system utilizes a closed loop water system, requiring only a few gallons a day of make up water. The Stimson installation, by contrast, used 18,000 gallons/day.

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By helping to improve local air and water quality, the Libby Forest Biomass Comprehensive Plan encourages the revitalization of the local economy. By assuring compliance with regulatory standards, the Plan opens the door for biomass resource based industries, such as a Scrimber mill.

In summary, many of the environmental concerns of the Working Group for forest health and air quality appear to coincide closely with the objectives of the EPA in their efforts to abate the asbestos contamination in Libby. We hope that you will be able to endorse the Comprehensive Plan as we go through the funding process for planning and implementation.

Respectfully,

Mike Powers

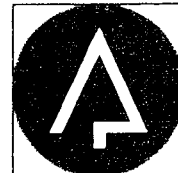
Gary Callihan

Ron Carter

Enclosures

Libby Biomass Working Group

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Prepared for EPA
Dream It, Do It Workshop
April 24, 25, 26, 2003

LIBBY BIOMASS WORKING GROUP MISSION STATEMENT

To implement solutions for the efficient and environmentally sensitive removal of overstocking from the forest and the optimal use of the removed wood fiber to create energy, products, jobs, a healthier and more historically natural environment, and a safer community and country in an economically sustainable manner with short-term declining government assistance.

Proposal Summary:

Libby Forest Biomass Comprehensive Plan

Development of a plan to use forest waste and low valued forest residues for the creation of jobs, energy, cleaner air, safer watersheds and reduction of condition prone to catastrophic wildfire for the protection of our community and cultural heritage.

The air of the proposed project is to plan the economical, sustainable methodology for the use of forest waste and low value residues from the forest for the creation of jobs, to support and enhance the reactivation of the local plywood mill, to produce low cost process heat and electrical energy, to ensure cleaner air, and to provide for safe, healthy watersheds through the reduction of the over stocked condition of our forests that renders them highly vulnerable to catastrophic wildfires.

A modern, clean-burning co-gen system is part of the solution of Libby's air quality problem. By combusting slash materials in a controlled environment, a co-gen provides a clean, energy producing end use for forest waste which is now disposed of by open burning. The burning of huge slash tonnages in this out-dated way degrades Libby's already poor air quality and exacerbates the suffering of those afflicted with asbestos-related diseases.

Forest Health Benefits

- Low-impact harvesting machinery and methods
- Return to low-intensity fire regime
- Healthier watersheds and streams
- No re-entrainment of deposited asbestos fibers by wildfire in Libby vicinity.
- No new roads
- Protection of old growth timber
- Does not affect Wilderness areas
- Reduces hazardous fuel loading in the urban interface.
- Reduction in over-stocked stems per acre will increase resistance of the stand to pests and disease
- Habitat and water quality enhancement
- Reduces risk of catastrophic wildfire

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